

Exhibit 24

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *in his official
capacity as President of the United
States, et al.*,

Defendants.

20 Civ. 5770 (JMF)

**DECLARATION OF MONTEREY
COUNTY HEALTH DIRECTOR ELSA
JIMENEZ**

Pursuant to 28 U.S.C. § 1746(2), I, ELSA JIMENEZ, hereby declare as follows:

I, Elsa M. Jimenez, declare as follows:

1. I am the Director of the Monterey County Health Department. I have a Master of Public Health degree from San Jose State University and have worked to ensure the health of Monterey County residents for nearly 20 years. Since 2001, I have served in a variety of program, management, and administrative roles in the areas of chronic and communicable disease prevention, injury prevention, building community capacity for health and well-being, and eradicating the social determinants of poor health.

2. On behalf of the Monterey County Health Department, I express my strong support in challenging the Presidential Memorandum's exclusion of undocumented immigrants from the apportionment count. With a 2010 census count of just over 415,000, Monterey County is already a hard-to-count region because of its high percent of rural populations. Deterring undocumented workers and their families, who comprise nearly 22% of the county's population, from participating in the 2020 U. S. Census, could result in a crippling effect on our population's health, education systems, built infrastructure, and the delivery of essential public services.

3. To the extent that the Presidential Memorandum deters immigrants and their households

from answering the census and those households are undercounted as a result, this could mean a reduction in federal healthcare funding that provides health, mental health, and injury prevention for our children, parents, pregnant women, seniors, and people with disabilities. Poor health outcomes will cause expensive overuse of hospital emergency departments, and could frustrate our ability to prevent communicable diseases, such as COVID-19. In Monterey County, undocumented workers are responsible for harvesting and processing a substantial portion of the nation's fresh vegetable and fruit production, a \$4.4 billion industry. Ill health will result in job loss, loss of productivity, and devalued agricultural lands.

4. A 2020 Census undercount will adversely affect Monterey County's ability to maintain critical yet aging roads, bridges, harbors, and transportation services. Clean drinking water, unobstructed waterways, water delivery systems to agricultural lands and homes, clean beaches, storm and sewer facilities, and access to broadband systems may be negatively affected.

5. It is said that children are our future, yet for every Monterey County child who is not counted in the 2020 Census we will lose approximately \$200,000 in federal funding that affords Title I grants for education, special education, the Women, Infants, and Children (WIC) program and Head Start and Early Head Start programs. A 2020 Census undercount will put our school districts at risk of losing hundreds of thousands of dollars for early-childhood education, high-poverty-area schools, special education, foster-care funding, and child-care support for low-income families. Public health education programs in schools will likely be curtailed, which can result in higher risk-taking behaviors among middle and high school students.

6. Beyond an unpredictable stream of funding over the next decade, an undercount of Monterey County's 2020 Census population will have detrimental lifelong and intergenerational impacts on individuals and our broader community's health and wellbeing.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on this 3rd day of August, 2020



ELSA JIMENEZ

Monterey County Department of Health Director